

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

RYAN WAYNE BARON and
AARON NICHOLAS DOSS

INDICTMENT

Case No. _____

Violations: 18 U.S.C. §§ 2251(a),
2251(e), 2252(a)(2), 2252(a)(4)(B),
2252(b)(1), 2252(b)(2), 2253(a), and
2422(b)

COUNT ONE

Attempted Sexual Exploitation of a Child

The Grand Jury Charges:

From in or about January 2022 to in or about January 2024, in the District of
North Dakota, and elsewhere,

RYAN WAYNE BARON

did knowingly attempt to use, persuade, induce, entice, and coerce a minor, namely, Jane
Doe 1, to engage in sexually explicit conduct for the purpose of producing visual
depictions of such conduct, knowing, and having reason to believe, that such visual
depictions were produced using materials that have been mailed, shipped, and transported
in or affecting interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2022 to in or about January 2024, in the District of North Dakota, and elsewhere,

RYAN WAYNE BARON

knowingly received visual depictions of Jane Doe 1, using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT THREE

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2014 to in or about January 2016, in the District of North Dakota, and elsewhere,

RYAN WAYNE BARON

knowingly received visual depictions of Jane Doe 2, using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FOUR

Distribution of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2022 to in or about December 2023, in the District of North Dakota, and elsewhere,

RYAN WAYNE BARON

knowingly distributed visual depictions of Jane Doe 3, using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT FIVE

Receipt of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2022 to in or about December 2023, in the District of North Dakota, and elsewhere,

AARON NICHOLAS DOSS

knowingly received visual depictions of Jane Doe 3, using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(2) and 2252(b)(1).

COUNT SIX

Coercion and Enticement of a Minor

The Grand Jury Further Charges:

From in or about September 2023 to in or about October 2023, in the District of North Dakota, and elsewhere,

RYAN WAYNE BARON and AARON NICHOLAS DOSS

did use, and attempt to use, a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce Jane Doe 3, who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, corruption or solicitation of a minor, which was a criminal offense under North Dakota Century Code § 12.1-20-05;

In violation of Title 18, United States Code, Section 2422(b).

COUNT SEVEN

Possession of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about September 2023 to in or about November 2023, in the District of North Dakota,

RYAN WAYNE BARON

knowingly possessed visual depictions of Jane Doe 2 that had been transported using a means and facility of interstate and foreign commerce, to wit, the highway, roads, and transport infrastructure, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

COUNT EIGHT

Possession of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2023 to in or about November 2023, in the District of North Dakota,

RYAN WAYNE BARON

knowingly possessed visual depictions that had been transported using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

COUNT NINE

Possession of Images Depicting the Sexual Exploitation of Children

The Grand Jury Further Charges:

From in or about January 2023 to in or about November 2023, in the District of North Dakota,

AARON NICHOLAS DOSS

knowingly possessed visual depictions that had been transported using a means and facility of interstate and foreign commerce, to wit, the internet, which depictions had been transported in interstate and foreign commerce by any means, including by computer, the production of which visual depictions involved the use of a minor engaging in sexually explicit conduct and which depictions were of such conduct;

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE NOTICE

Upon conviction of violating Title 18, United States Code, Sections 2251 and 2252, as charged in this Indictment,

RYAN WAYNE BARON and AARON NICHOLAS DOSS

shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped, and received in violation thereof and any and all property used and intended to be used in any manner and part to commit and to promote the commission of such violations, including, but not limited to, the following:

- Two 128GB Micro-SD digital data storage devices;
- One 64GB SanDisk brand digital data storage device;
- One 80GB Western Digital brand digital storage device;
- One Motorola Moto Edge 5, Model XT2141 smartphone;
- One Motorola Model Z4 smartphone; and
- One iPhone 14 Pro Max, serial number DQ9THYJQT9.

By virtue of commission of one or more of the felony offenses as charged in this Indictment, all right, title, and interest in the above-described property is vested in the United States and is hereby forfeited to the United States, pursuant to Title 18, United States Code, Section 2253(a).

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Mac Schneider
MAC SCHNEIDER
United States Attorney

GLD/tmg